

# WT PARTNERSHIP (WT) MODERN SLAVERY STATEMENT

This Modern Slavery (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) (the Australian Modern Slavery Act) by WTP Australia Pty Limited (ABN 69 605 212 181) (WT) in respect of WT and its related bodies corporate (“WT Group” or “the Group”) (**Mandatory criterion 1**).

This Statement also covers the WT Group’s offshore subsidiaries and activities. This Statement relates to the WT Group financial year 1 July 2023 to 30 June 2024 (FY2024).

WTP Australia Pty Limited	WTP Property Consultants Limited
WT Partnership Aust. Pty Limited	WT Software Pty Limited
WT Consultancy Pty Limited	SSA Quantity Surveyors Ltd
WTP America LLC	WTP Cost Advisory Services India Pvt Limited
WT Synergon India Private Limited	WTP Project Management LLC
WT Middle East Consultancy LLC	

## ABOUT WT GROUP (MANDATORY CRITERION 2)

WT Group is a quantity surveying and construction cost management organisation that provides a range of consultancy services. The majority of the Group’s services businesses operate in Australia, with offshore operations located in the USA, Canada, India, UAE and the Kingdom of Saudi Arabia. Key businesses include quantity surveying, infrastructure cost engineering, superintendent and independent certifier services, facilities management consultancy, asset management advisory, P3 advisory, lenders technical advisory, scheduling, building technical due diligence, independent commissioning agents, and contracts, claims & disputes (expert witness).

The business activities are broad and include provision of feasibility/design application cost estimates, cost plans, bill of quantities, construction cost cashflows, cost management reporting & analysis, progress claims management, practical completion certification, tax depreciation schedules, building technical due diligence reports, building & asset commissioning management, program risk modelling, analysis and mitigation strategies, program optimisation, project control, project set-up and audit (schedule framework and development), independent program monitoring and reporting, integrated cost and schedule performance measurement, analysis and forecasting, program risk and issues management, program prolongation and forensic analysis, analysis of delay, disruption and acceleration claims, analysis of the cost of delays and damages assessment, forensic analysis and expert witness reporting, as-built program development, pre-bid / contract program health check and critique, extension of time/time impact assessment & what-if analysis (preparation and defence), predictive modelling, lenders technical due diligence (pre-contract advice and due diligence), manpower/plant histograms/resource analysis, master control programming and scheduling, construction programming and scheduling.

Other operational activities include direct employment of workers, software development, financial investments, managed/operated joint ventures, leasing of property, charitable activities, strategic sourcing, sales, marketing, communications, and public relations.

WT Group directly employs more than 800 personnel and serves hundreds of customers through 33 offices. In FY2024, the Group provided advice to customers on hundreds of billions in construction projects.

WT Group has a global supply chain made up of almost 1,100 contracted suppliers, representing a total value of some \$27 million in purchased goods and services. Supply chain relationships include suppliers from the following key industries: Commercial & Professional Services (printing, cleaning, dining and catering, equipment repairs, storage and warehousing, employment agencies, employee training, payroll and benefit support services, consulting services, and marketing services); Transportation (courier, logistic services, mail delivery); Consumer Services (travel agency, restaurants, bars, pubs, take-away facilities, education, legal services); Retailing (internet and direct marketing retail, apparel retail, computer, electronics retailer, office supplies, automotive retail, furniture); Food & Staples Retailing (food retails); Insurance; Software & Services (IT consulting & other services, software); Telecommunication Services (internet services); Media & Entertainment (advertising); Utilities (electric and gas utilities); and Real Estate (office rental).

The Group seeks to do business with suppliers and other third parties that have similar values, ethics, and sustainable business practices, including those related to human rights and modern slavery. The Group recognises that as a purchaser of goods and services, the conduct and performance of its suppliers can influence its impact and reputation within the communities in which the Group operates.

WT Group understands that the Environmental, Social and Governance (ESG) risks relating to both customers and suppliers will vary depending on their industry, geographic location, and company size (modern slavery risk is considered as a part of social risk). Therefore, ESG risks are considered in the Group's risk appetite and risk management framework, including the scope of WT's customer-related policies and processes and supply chain-related policies. Employees are expected to consider, and where relevant, address these ESG risks in their day-to-day activities.

### **RISK OF EXPOSURE TO MODERN SLAVERY (MANDATORY CRITERION 3)**

As a professional services organisation with a highly educated and trained workforce, WT Group considers the risk of modern slavery within its direct business operations to be very low. However, the Group recognises that through its supply chain and other third-party relationships it can be indirectly exposed to the risk of modern slavery.

The Group is assessing its supply chain to identify potential areas where the Group could be exposed to modern slavery risks. The key areas identified as focus points are (i) office consumables such as tea, coffee, sugar, cocoa and biscuits for kitchens; (ii) cleaning services employed by building owners or facilities managers for buildings occupied by WT; (iii) corporate clothing; (iv) print and promotional goods and services; and (v) catering services for office events.

WT Group is continuously enhancing risk management processes to identify, assess, mitigate, and monitor potential risk areas where the Group could be exposed to modern slavery concerns. This includes:

- The use of a 'High Risk ESG sectors and sensitive areas list' which is used to determine customers and suppliers that may have a higher risk of ESG issues and for which additional ESG risk assessment and due diligence may be required.
- The use of a modern slavery risk matrix to help employees in customer facing areas identify and assess potential for modern slavery. The matrix lists countries and

sectors/activities that may have a higher risk of modern slavery. Examples of sectors identified with higher potential for modern slavery risk include, but are not limited to, domestic and cleaning services, contract labour, hospitality, textiles, printing and sectors and businesses with supply chains extending into high-risk countries for modern slavery.

#### **ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES (MANDATORY CRITERION 4)**

WT Group commenced integrating consideration of modern slavery into its frameworks, policies, systems, and processes in 2020-21. In FY2025, WT will undertake further work to improve the Group's understanding and management of modern slavery risk. This will include organising a series of internal working groups to consider the risk of modern slavery within the Group's business activities, suppliers, and customers.

WT Group will undertake a number of actions to assess and address modern slavery risk. These actions are grouped into the following areas:

- Governance and risk management – A description of WT Group's governance and risk management approach which includes consideration of modern slavery risk.
- Supply chain management – A summary of the Group's supply chain management practices and activities to address and assess modern slavery risk.
- Transaction monitoring – Information about transaction monitoring activities to detect and help prevent modern slavery associated with use of the Group's services.
- Identification and investigation of modern slavery instances – A description of the actions taken by the Group when potential modern slavery or human trafficking activities are identified.
- Grievances/complaints – An overview of grievance, complaints, and feedback processes, which also provide a channel for external stakeholders to raise concerns about suspected instances of modern slavery.
- Modern slavery instances – Information about the detection of modern slavery.
- Training and communication – Actions taken to educate employees on modern slavery risk.

#### **GOVERNANCE**

The WT Board of Directors (Board) has ultimate responsibility for governance and oversight of modern slavery risks and approval of this Statement. The Board oversees enterprise-wide risk management through the Executive Management Team.

Across the Group, we believe we should treat customers, colleagues, and members of the community with dignity, fairness, and respect in accordance with the Code of Conduct (Code) that applies to all employees of the Group. The Code states that the Group does not tolerate slavery, human trafficking, forced or child labour, or child exploitation. In addition, the Group has various other policies which will incorporate requirements to manage modern slavery risk. These policies include the following:

- Group Procurement Policy
- Group Outsourcing Policy
- Group Whistle-blower Policy

### Supply chain management

WT Group has embedded management of modern slavery risks into its supply chain processes. The procurement of most goods and services provided to the Group is managed via centralised sourcing functions in Australia (for all Group entities in the jurisdiction). Offshore entities undertake their own direct local procurement.

Procurement and supplier management due diligence includes protocols that require suppliers to declare their compliance with modern slavery laws. Suppliers that are identified as non-compliant with our supplier code of conduct will be asked to complete a Modern Slavery Supplier Assessment. The assessment will outline the requirements suppliers are expected to meet to do business with the Group.

WT's standard contract terms and conditions include provisions that require the parties to assess and confirm their compliance with modern slavery laws. WT's standard consultancy and sub-contractor contracts contain modern slavery clauses which require service providers to commit to not using forced labour, slavery, or servitude and to having their own policies and procedures designed to ensure compliance with anti-slavery laws. Clauses also include provisions to allow WT to request evidence of implementation of suppliers' modern slavery risk management policies and processes.

WT's offshore entities are implementing similar supply chain management processes to Australia with plans to enhance their risk assessment and due diligence processes and controls to help identify, assess, and address modern slavery risk. This includes reviewing suppliers (both new and existing) and modern slavery risk management and processes. The global roll-out of our ERP application Certinia (previously called FinancialForce) will enable improved visibility of, and communications with, all Group suppliers. We anticipate implementation will be completed by 30 June 2025.

In FY2024, WT Australia have contacted existing suppliers to complete a Supplier Declaration, and also requested new suppliers to complete WT's new vendor form which contains Modern Slavery Law compliance conditions. WT's offshore entities have built up the corresponding supplier registers, where suppliers' industries and key activities are identified; and the offshore entities' Supplier Declaration and new vendor forms are ready to come into use with the Group implementation of Certinia. Actions that will continue to be undertaken in FY2025 to minimise the risk of modern slavery within the WT Group's supply chains include: following up with existing suppliers to complete a Supplier Declaration confirming compliance with modern slavery laws, applying new vendor forms to all WT Group's suppliers and in due course asking suppliers in high-risk sectors such as clothing and textiles, cleaning and promotional products to complete an online survey to help assess compliance with modern slavery laws.

### **INVESTIGATING AND MANAGING POTENTIAL INSTANCES OF MODERN SLAVERY AND HUMAN TRAFFICKING (THE PROCESS)**

The Group's executive management team (EMT) in Australia:

- Investigate suspected cases of human exploitation identified through the monitoring they undertake
- Investigate unusual activity associated with products and services identified by WT Group employees
- Report to regulators and law enforcement as required on possible crime-related activity.

Depending on the situation, the Group may engage directly with a supplier, third party or customer to better understand how they are managing their modern slavery risks. Following this engagement,

the Group may include relevant clauses in contracts or may terminate an agreement or exit a relationship where it is determined that the party is not managing their risk appropriately.

#### Grievance and feedback mechanisms

The Group recognises it is important to listen and respond to concerns raised by customers and other stakeholders on a wide range of issues. The Group is committed to doing business in a responsible manner – this includes how the Group manages its operations (including supply chain). Therefore, in FY2025 the Group will make improvements to its website information to provide more detail on WT Group’s grievance process (which includes grievances related to modern slavery).

In addition, the Group has a Whistle-blower Protection Policy and associated Group Whistle-blower Program that allows employees and contractors to the Group to raise concerns in a confidential manner. This channel is available for reporting modern slavery concerns. Grievances may also be received via social media, direct correspondence, or bodies such as the Human Rights Commission.

Where grievances or concerns are raised, these are investigated and addressed as appropriate. This may include engagement with customers and other stakeholders. In these cases, steps are taken to understand the issue(s) and take appropriate action. This may involve referring the matter to the appropriate authorities (in the case of suspicions or allegations of modern slavery) or engaging with the customer about areas of the organisation that WT Group service. It also includes the need to consider remediation processes and remedy if modern slavery is occurring.

### **IDENTIFICATION OF POTENTIAL INSTANCES OF MODERN SLAVERY AND HUMAN TRAFFICKING**

In FY2024:

- No instances of modern slavery were identified in direct association with the Group’s own operations, or through sourcing-related risk assessments in relation to the Group’s supply chain.
- No Whistle-blower program cases were associated with modern slavery.
- No modern slavery concerns were raised with the Group about customers through its feedback channels/grievance mechanism.

When a modern slavery concern is raised, the Group conducts any required investigations in accordance with regulatory requirements, policy, and procedures, which may include reporting the matter to law enforcement.

### **TRAINING AND COMMUNICATIONS**

Modern slavery risk is considered with respect to the Group’s value chain – being business operations (including customers and WT Group’s own operations), supply chain and third parties. All employees will receive training on modern slavery through annual mandatory risk awareness training and/or a specific Modern Slavery training. This training will provide guidance on the Group’s approach to modern slavery risk, signs of modern slavery and the key channels for escalation of concerns/possible modern slavery instances for investigation.

### **ASSESSING EFFECTIVENESS OF MODERN SLAVERY RISK MANAGEMENT (MANDATORY CRITERION 5)**

When the Group assesses the effectiveness of modern slavery risk management this means the Group is assessing its ability to detect and address modern slavery risk and reduce exposure to modern

slavery risk in its operations, or through exposure to third parties in the Group's value chain (customers, suppliers and other third parties).

We acknowledge that our review and assessment of our actions to identify and address modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward. For example, over the last 12-24 months we have mandated modern slavery provisions into all our: vendor-supplier forms, standard contact terms and conditions, standard consultancy and sub-consultancy agreement. Furthermore, we have incorporated modern slavery provisions into our employee code of conduct and have an employee whistle-blower hot line that staff can call should they believe a breach of modern slavery law has occurred.

A key part of the Group's approach to risk management is identifying accountable people, assigning obligations to these people, and requiring controls to be in place to meet these obligations and test these controls.

In order to monitor and assess effectiveness of modern slavery risk management across the Group, modern slavery risk management obligations are assigned to relevant people within the business and customer facing areas across the Group. These areas are required to have controls in place to ensure modern slavery risk is identified and managed in accordance with risk appetite, policies, and procedures. This will help the Group to monitor the effectiveness of modern slavery risk management and controls.

#### **CONSULTATION ON PREPARING A JOINT STATEMENT (MANDATORY CRITERION 6)**

During FY2020, the Group identified related bodies corporate which triggered the consolidated revenue threshold for being a reporting entity under the Australian Modern Slavery Act.

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. An engagement plan was developed to ensure entity Boards (including reporting entity Boards) were briefed, so they were aware of their accountabilities and informed of: (i) work under way to assess the potential for each entity to be exposed to modern slavery risk in its value chain (from suppliers through to customers), (ii) plans and progress related to modern slavery risk management across WT Group, and (iii) key actions being undertaken to understand and manage modern slavery risk relevant to each entity's activities.

#### **OTHER RELEVANT INFORMATION (MANDATORY CRITERION 7)**

##### **IMPACTS OF COVID-19**

COVID-19 continues to have limited impact on the Group's supply chain both from the perspective of WT Group's requirements and impacts on supplier's own operations and supply chains.

The Australian Government indicated that the risk and detection of child exploitation increased significantly during the COVID-19 pandemic. The EMT team considers such information in its monitoring of the external threat environment and reports as required.

Signed

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The principal governing body of the reporting entity is the Board of Directors. The Board approved the Statement at its intercessional meeting of 31 October 2024. The below signatories are Board Directors of the reporting entity and are authorised to sign the Modern Slavery Statement 2024 on behalf of the WT Board.




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Timothy Roberts  
 Executive Director  
 31 October 2024




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Philip Anseline  
 Executive Director  
 31 October 2024